



BILL RICHARDSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us

ENTERED



RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 27, 2004

R. Paul Detwiler, Acting Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Dr. Steven Warren, President
Washington TRU Solutions LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

**RE: NMED APPROVAL OF THE IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL
LABORATORY ANALYTICAL LABORATORIES SAMPLING AND ANALYSIS PROGRAM,
FINAL AUDIT REPORT, AUDIT A-04-17
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088**

Dear Mr. Detwiler and Dr. Warren:

On July 2, 2004, the New Mexico Environment Department (NMED) received the Final Audit Report of the Idaho National Engineering and Environmental Laboratory (INEEL) Analytical Laboratories Sampling and Analysis Program (**Analytical Lab Program**) Audit Number A-04-17 (**Audit Report**), from the Department of Energy's Carlsbad Field Office (CBFO). CBFO and Washington TRU Solutions LLC (**the Permittees**) were required to submit this Audit Report under the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit as specified in Permit Condition II.C.2.c. The intended scope of this annual recertification audit was to ensure the continued adequacy, implementation, and effectiveness of the INEEL Analytical Lab Program associated with headspace gas analysis; solids sampling and analysis; SUMMA® canister preparation and certification for use by other generator sites; visual examination of homogeneous solid wastes; and generation-level data verification and validation. The INEEL Analytical Lab Program is a complex-wide service supported by CBFO. The Audit Report consisted of the following items:

- A narrative report
- Completed copies of relevant Permit Attachment B6 checklists

040846



- Final INEEL Analytical Lab Program standard operating procedures (hardcopy and electronic copies)
- Objective evidence examined during the audit
 - General information
 - Solids sampling and analysis
 - Headspace gas analysis
 - SUMMA® canister preparation and certification
 - Visual examination of homogeneous solids
 - Generation-level data verification and validation

NMED representatives observed the INEEL Analytical Lab Program audit on May 25-27, 2004. NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Conditions II.C.2 (Audit and Surveillance Program) and II.C.1 (Waste Analysis Plan [WAP]). The Audit Report indicates there were no WAP-related conditions adverse to quality.

Attached are NMED's comments based upon observation of the INEEL Analytical Lab Program audit and review of the submitted information. These are provided to guide future audit report preparation and to assist the Permittees in understanding NMED's concerns. NMED requests that the Permittees correct or address the items listed in the attachment and return them, indicating revisions to any text in the checklists with redline/strikeout annotation. This will ensure the administrative record contains a complete and accurate Audit Report.

NMED concludes that this revised Audit Report demonstrates that the INEEL Analytical Lab Program has adequately implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Final Audit Report for the INEEL Analytical Lab Program Audit A-04-17 for analytical laboratory waste characterization processes associated with contact-handled waste, and amends the previous Audit Report approval for Audit A-03-15 issued by NMED on November 20, 2003 to include all waste forms and processes evaluated by this recertification audit.

If you have any questions regarding this matter, please contact Steve Zappe at (505) 428-2517.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:soz

Attachment

cc: Charles Lundstrom, NMED WWMD
Steve Zappe, NMED HWB
Tracy Hughes, NMED OGC
C. Steven Allred, IDEQ
Kathleen Trever, INEEL Oversight
Laurie King, EPA Region 6
Betsy Forinash, EPA ORIA
Connie Walker, Trinity Engineering
Don Hancock, SRIC
Joni Arends, CCNS
File: Red WIPP '04

NMED COMMENTS ON THE
IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL LABORATORY
ANALYTICAL LABORATORIES SAMPLING AND ANALYSIS PROGRAM
FINAL AUDIT REPORT A-04-17

NMED's review indicated that the Audit Report showed less attention to detail than presented in previous Audit Reports and, unless remedied, this less rigorous approach to preparation could result in significant deficiencies in future Audit Reports. The body of the Audit Report appears to generally address the applicable elements. However, there are some omissions, errors, and inconsistencies including but not limited to the following items:

- Pertaining to question 8 of the B6 Checklist, the reference cited is procedure ACMM-2810 (all). It is incorrectly cited for headspace gas sampling, and should only be cited for solids sampling.
- Pertaining to question 11 of the B6 Checklist, the reference cited is procedure ACMM-9941, Section 6.14. The section is non-existent.
- Pertaining to question 11 of the B6 Checklist, the reference cited is procedure PLN-600, p. xix. The exact reference should be PLN-600, p. xx.
- Pertaining to questions 12, 13, 26, 27a, 29, 29a, 32, 34, 59, 304, 305, 306, 307, 308, 309, and 313 of the B6 Checklist, procedure INEEL HFEF-OI-6890 was referenced. The problem with the procedure is that the effective date was originally set for 04/08/03, but someone with the initials of 'TB' changed the effective date to 04/24/03. Furthermore, Klayne Corburn (WCA Group Leader) signed off on the document on 04/16/03. NMED questions the first use of this procedure due to these apparent discrepancies. There is a possibility that the procedure could have been used past 04/16/03 but before 04/24/03. Please verify the effective date for this procedure.
- Pertaining to questions 114, 115, 118, 119, 120, and 122 of the B6 Checklist, procedure INEEL HFEF-OI-6862 was referenced. The problem with the procedure is that the effective date was originally set for 04/20/03, but someone with the initials of 'TB' changed the effective date to 04/24/03. Furthermore, Klayne Corburn (WCA Group Leader) signed off on the document on 04/16/03. There is a possibility that the procedure could have been used past 04/16/03 but before 04/24/03. Please verify the effective date for this procedure.